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**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA**

**VICTORIA A. AMELINA, AN
 INDIVIDUAL; AND A.A.; D.S
 AND B.S., EACH INDIVIDUALS
 AND MINORS BY AND
 THROUGH THEIR GUARDIAN
 AD LITEM, VICTORIA A.
 AMELINA,**

PLAINTIFFS,
V.

**MANUFACTURERS AND
 TRADERS TRUST COMPANY
 AKA M&T BANK, SAFEGUARD
 PROPERTIES, LLC, AND THE
 WOLF LAW FIRM, A LAW
 CORPORATION,**

DEFENDANTS.

Case No: 14-CV-1906-WQH-NLS

**PLAINTIFFS' NOTICE OF
 MOTION AND MOTION FOR
 LEAVE TO FILE THIRD
 AMENDED COMPLAINT**

Date: January 19, 2016

Time: N/A

Room: N/A

Judge: Hon. William Q. Hayes

**No Oral Argument Unless
 Requested by the Court**

TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:

NOTICE OF HEREBY GIVEN that on January 19, 2016 or as soon thereafter as the matter may be heard, Plaintiffs through undersigned counsel, will move this court located at 333 West Broadway, San Diego, CA 92101, Courtroom 14B for leave to amend to file a Third Amended Complaint. Plaintiffs move this Court for an order under Rule 15(a) of the Federal Rules of Civil Procedure granting Plaintiffs leave to file the Third Amended Complaint in the form shown in the copy of the proposed Third Amended Complaint that is attached to the Declaration of Jessica R. K. Dorman as Exhibit A.

This Plaintiffs' Notice of Motion and Motion for Leave to Amend to File a Third Amended Complaint will be made based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, Exhibits, court records, any other attached or relevant documents, and such other oppositions, replies, or briefs as may be properly presented to the Court at or prior to the hearing of this motion. The grounds for this motion are fully set out in the Memorandum of Points and Authorities below.

Hyde & Swigart

Date: December 16, 2015

By: /s/Jessica R. K. Dorman
Jessica R. K. Dorman
Attorneys for Plaintiff

